

RECEIVED  
CENTRAL FAX CENTER

JUN 29 2007

Remarks**I. STATUS OF THE CLAIMS**

Claims 1-6 are pending in this application. Claims 1, 5, and 6 are amended to correct informalities.

**II. OBJECTIONS TO THE CLAIMS**

Claims 1 and 5 were objected to for informalities. Those informalities have been corrected in the manner suggested by the examiner.

**III. Rejections Under 35 U.S.C. § 103**

Claims 1-4 and 6 stand rejected under 35 U.S.C. § 103(a) as unpatentable over U.S. Patent 6,334,119 to Gagliardi ("Gagliardi") in view of U.S. Patent Application 2002/008301 to Carroll. Also, claim 5 stands rejected under 35 U.S.C. § 103(a) as unpatentable over Gagliardi in view of Carroll in further view of U.S. Patent Application 2003/0101446 to McManus ("McManus").

It is respectfully submitted that the primary reference, Gagliardi, fails to disclose certain features of independent claim 1, and that the secondary references fail to correct these deficiencies. In particular, Gagliardi fails to disclose the claimed features whereby the networking features are directly embedded in the inserter controller computer.

Claim 1 includes the following recitation, which is not disclosed in Gagliardi or the other asserted references:

"the controller computer further comprising a network port for directly transmitting status data processed by the network protocol object to an external network, and the network port and the network protocol object further configured for accepting incoming requests from the external network, the controller computer configured for transmitting inserter status data in real-time, without need for withdrawal of information from a database or repository in the controller computer..."

Rather, Gagliardi discloses a conventional arrangement whereby the file server 102 is located external to the inserter systems 10, and acts as a communication means from the inserter systems 10 to the operating management system 100. This type of remote networking arrangement was acknowledged and described in the background of the present application:

"With conventional inserter systems it is sometimes desired to remotely monitor the status and configuration of the inserter equipment. In order to accomplish this, the inserter control system stores status information for various modules in a database. Such database is typically stored on a hard drive on a controller computer. Periodically this database is uploaded to an external network server from the controller computer hard drive. This network server includes the appropriate protocols to allow the database information to be transmitted over a network. For example, an HTTP Internet server may serve a database or repository populated with information from the inserter controller." (Specification, carryover paragraph, pages 3-4).

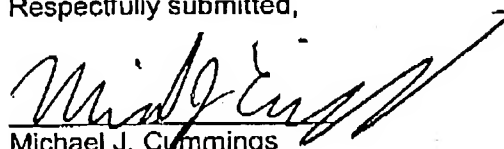
The long standing need for the improved system recited in Claim 1 was also described in the specification of the present application:

"The present invention fills a long standing need to provide the most current inserter status and configuration information for transmission over a network. The invention eliminates the need for a database or repository for storing inserter status information by incorporating a web server directly into the inserter control equipment. By incorporating the web server directly into the inserter controller, current status information may be efficiently provided on demand, and in real-time." (Specification, page 4, lines 9-14).

Accordingly, it will be understood that Gagliardi does not teach the recited network features integrated into the inserter controller, and that Gagliardi only describes the conventional system that was to be improved upon by the present invention. The Carroll and McManus references were asserted for other features and fail to correct these identified deficiencies of Gagliardi.

It is respectfully submitted this application is in a condition for allowance. Please contact the undersigned representative if there are any questions regarding this application.

Respectfully submitted,



Michael J. Cummings  
Reg. No. 46,650  
Attorney for Applicants  
Telephone (203) 924-3934

PITNEY BOWES INC.  
Intellectual Property and  
Technology Law Department  
35 Waterview Drive  
P.O. Box 3000  
Shelton, CT 06484-8000